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10 Attorneys for THE BOARD OF TRUSTEES  
11 OF THE UNIVERSITY OF ILLINOIS, erroneously sued as  
12 THE UNIVERSITY OF ILLINOIS-URBANA CHAMPAIGN;  
13 and DR. GEORGE GOLLIN

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

16 ST. LUKE SCHOOL OF MEDICINE;  
17 DR. JERROLL B.R. DOLPHIN and  
18 DR. ROBERT FARMER on behalf of  
19 himself and all others similarly situated, as  
20 applicable,

21 Plaintiffs,

22 v.

23 REPUBLIC OF LIBERIA; MINISTRY OF  
24 HEALTH, a Liberian Governmental  
25 Agency; MINISTRY OF EDUCATION, a  
26 Liberian Governmental Agency; LIBERIAN  
27 MEDICAL BOARD, a Liberian  
28 Governmental Agency; NATIONAL  
COMMISSION ON HIGHER  
EDUCATION, a Liberian Governmental  
Agency; NATIONAL TRANSITIONAL  
LEGISLATIVE ASSEMBLY, a Liberian  
Governmental Agency; DR. ISAAC  
ROLAND; MOHAMMED SHERIFF; DR.  
BENSON BARH; DR. GEORGE GOLLIN;  
EDUCATION COMMISSION FOR  
FOREIGN MEDICAL GRADUATES; a  
Pennsylvania Non-Profit organization;  
FOUNDATION FOR ADVANCEMENT  
OF INTERNATIONAL EDUCATION  
AND RESEARCH; a Pennsylvania Non-  
Profit organization, UNIVERSITY OF  
ILLINOIS-URBANA CHAMPAIGN, an  
Illinois Institution of Higher Learning;  
STATE OF OREGON, Office of Degree  
Authorization,

Defendants.

Case No.: 10-CV-01791 RGK (SHx)

[Honorable R. Gary Klausner]

REPLY TO (A) MOTION FOR  
SANCTIONS AGAINST THADDEUS  
J. CULPEPPER AND JERROLL B.R.  
DOLPHIN PURSUANT TO 28 U.S.C.  
A§ 1927 AND THIS COURT'S  
INHERENT POWERS, AND (B)  
MOTION FOR COSTS PURSUANT TO  
28 U.S.C. § 1919

DATE: September 13, 2010  
TIME: 9:00 A.M.  
COURTROOM: 850

1 Defendants and Moving Parties file this Reply simply to inform the Court  
 2 that we understand that plaintiffs have chosen not to file any opposition to  
 3 Defendants' two pending motions, one for sanctions (Docket No. 64) and one for  
 4 costs (Docket No. 63).

5 Indeed, not only did we not receive any opposition papers (and our  
 6 review of the Court's docket confirms that nothing was filed with the Court either),  
 7 we have had no communication from plaintiffs' counsel (or from plaintiffs, for that  
 8 matter) of any kind at any time regarding these motions.

9 Accordingly, for the reasons set forth in each motion, we believe an order  
 10 awarding sanctions and costs against plaintiffs and their counsel, and in favor of  
 11 defendants Dr. George Gollin, and The Board Of Trustees Of The University Of  
 12 Illinois, is necessary and appropriate. This is especially true given the frivolousness  
 13 of the action, and the unnecessary motions defendants were required to file even after  
 14 plaintiffs' attorney acknowledged that plaintiffs' action should have been dismissed as  
 15 to our clients on Eleventh Amendment grounds. Plaintiffs apparently do not disagree  
 16 – or at a minimum do not care enough to file an opposition.

17 Respectfully submitted,

18  
 19 DATED: August 30, 2010

MICHAEL D. YOUNG  
 NICOLE C. RIVAS  
**ALSTON & BIRD LLP**

21 /s/

22 \_\_\_\_\_  
 23 Michael D. Young  
 24 Attorneys for Defendant THE BOARD OF  
 25 TRUSTEES OF THE UNIVERSITY OF  
 26 ILLINOIS  
 27  
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